

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

(FINAL)

Conditional Major, Construction / Operating

Permit: F-04-020 R2

Duro Standard Products Company, Inc.

Florence, Kentucky 41042

August 15, 2007

Ibrahim AL-Burai, Reviewer

SOURCE ID: 21-015-00019

SOURCE A.I. #: 174

ACTIVITY ID: APE20070002

MINOR PERMIT REVISION FOR REPLACEMENT AND ADDITION OF PRESSES, (F-04-020 R2):

The source is replacing press M05 (#20181) with a similar size and capacity (20166), and adding a new press M25(#20181) with two printers with this revision. Also one printer M10 (#20126) has been removed so that the facility total will remain 53 presses following the new construction. Existing source-wide permit emission limitations will not need to be revised. Duro plans to continue operating below the emission caps, therefore the source-wide PTE has not changed.

MINOR PERMIT REVISION FOR REPLACEMENT AND ADDITION OF PRESSES, (F-04-020 R1):

The source is replacing (2) two product and packaging flexographic presses with (2) presses of similar size and capacity, and adding (4) four additional flexographic presses with this revision. Also several of the existing presses have been removed so that the facility total will now be 53 presses following the new construction. Existing sourcewide permit emission limitations will not need to be revised. Duro plans to continue operating below the emission caps, therefore the sourcewide PTE has not changed.

Since the original permit issuance, Boone County has been reclassified as non-attainment for ozone. The original sourcewide permit had the presses divided into two sections of the permit, between those presses that were constructed when Boone county was non-attainment for ozone and therefore subject to 401 KAR 59:212, and those presses that were constructed when Boone County was in attainment for ozone. Now that Boone County is basic nonattainment for ozone, all presses are subject to 401 KAR 59:212.

Also the regulation 401 KAR 59:185 has been revised since permit issuance, so the new requirements from this regulation are being added to the permit.

SOURCE DESCRIPTION, (F-04-020):

The source manufactures paper bags to which an image is applied (type and art). Wide-web flexographic presses used to apply images are the primary source of emissions from this facility. Currently there are (61) flexographic presses. There are also (2) parts cleaners classified as

insignificant activities and (2) facility boilers, (59:015).

COMMENTS:

- Duro Standard Products Company has requested a Conditional Major permit since anticipated actual emissions are below major source thresholds. This is due to the exclusive use of water-based inks.
- Prior to August 30, 2002, Boone county was designated moderate, non-attainment, for ozone, hence Regulation 401 KAR 59:212, New graphic arts facilities using rotogravure and flexography, applied to the facilities in existence at this time. Operation procedures required by 59:212, for the existing facilities must continue to be practiced per Regulation 50:012, Section 1 (5).
 - The permittee shall continue to use water base inks as described in Regulation 401 KAR 59:212, Section 6 (1).
- Regulation 40 CFR Part 63, Subpart KK—National Emission Standards for the Printing and Publishing Industry is applicable. This source is subject only to the provisions of § 63.829(d) and § 63.830(b)(1) of this subpart, as the Conditional Major permit will limit emissions to below major source thresholds.
- Emissions for the flexographic presses were determined by material balance.
- Emissions from the boilers are based on AP-42 factors.
- Emissions from the parts cleaners were determined by material balance.

EMISSION AND OPERATING CAPS DESCRIPTION:

Operating limitations shall be, VOC emissions no more than 20 TPY and single HAP emissions no more than 9.0 TPY.

OPERATIONAL FLEXIBILITY:

Duro Standard is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.